

Gifts and Hospitality Policy

2019-20



Approved by the Finance and Audit Committee 9th April 2019 and Stockingford on conversion

Inspire Education Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Staff, Trustees and Governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

In order to protect all individuals associated with the Trust, and the reputation of the Trust and its academies, from accusations of bribery or corruption Staff, Trustees, and Governors must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to:

- offer, promise or give a bribe;
- request, agree to or accept a bribe;
- (by an organisation) fail to prevent bribery by those acting on its behalf (associated persons) to obtain or retain business or a business advantage for the organisation.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

The Trust and each Academy will hold a Gifts and Hospitality Register. All gifts/hospitality over the value of £30 must be recorded in the Gifts and Hospitality Register.

What is a gift?

A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

What is hospitality?

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

What gifts or hospitality can be accepted without any approval?

You can accept gifts and hospitality, which are small gestures and have a value of £30 or less, without the approval of the Head teacher. Gifts and hospitality of this nature do not need to be recorded in the school's Gifts and Hospitality Register.

What things should I think about before I decide what to do?

You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit or harm to the academy in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the academy's, support or favor.

What gifts or hospitality need approval from the Head teacher or Chair of Governors?

Any gift or hospitality which is more than just a token, defined as a having a value of more than £30, should be politely refused or returned. You must have the prior written approval of the Head teacher if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you or your Head teacher has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chair of Governors.

What gifts or hospitality should never be accepted?

You must never accept;

- cash or monetary gifts;
- gifts or hospitality offered to your husband, wife, partner, family member or friend;
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
- Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.

What should I do if I receive a gift without warning?

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to your Head teacher as soon as possible and let the Head teacher decide what you should do with the gift. Your Head teacher may decide to return the gift, may ask the Chair of Governors for a view, or may donate the gift to a worthy local cause.

If such offers are made to Head teachers, the Executive Principal, the MAT Business Manager or Directors, the matter should be referred to the Chair of the Finance Committee.

What should I do if I get offered a gift or hospitality?

You must make sure that all offers you receive which have a value of more than £30 are recorded in the academy's Gifts and Hospitality Register, which is kept in the Admin office.

Do I need to record offers that I decline?

Yes - all offers of gifts or hospitality, which have a value of more than £30, must be recorded in the academy's register, even if you don't accept.

What should I do if I am in doubt?

If in doubt, always speak to the Head teacher. It is your responsibility to follow the trust's guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

What would happen to me if I didn't follow the guidance?

The academy will take disciplinary action against you if you failed to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing you to be influenced in respect of the academy's business dealings. This means you could be prosecuted by the Police.

Date of approval: 9th April 2019

Signature: Accounting Officer

Signature: Chair of Finance Committee

Renewal Date: Spring term 2020

A signed copy is kept on file in the Executive Principal's MAT office and with Office Managers in all Academy Admin Offices.

THE DO's and
DON'T's

DO	DON'T
<ul style="list-style-type: none"> • Read and follow the guidance on gifts and hospitality 	<ul style="list-style-type: none"> • Accept any gifts or hospitality which have a value of more than £30 without the approval of the Head teacher, or the Chair of Governors as necessary
<ul style="list-style-type: none"> • Seek advice from the Head teacher, Business Manager or Chair of Governors if you are in doubt 	<ul style="list-style-type: none"> • Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
<ul style="list-style-type: none"> • Record all offers of gifts and hospitality which have a value of more than £30 in the School's register, whether accepted or not 	<ul style="list-style-type: none"> • Accept cash or monetary gifts
<ul style="list-style-type: none"> • Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything 	<ul style="list-style-type: none"> • Accept a gift or hospitality as an inducement or reward
<ul style="list-style-type: none"> • Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality 	<ul style="list-style-type: none"> • Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> • Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body 	<ul style="list-style-type: none"> • Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> • Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept 	<ul style="list-style-type: none"> • Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
<ul style="list-style-type: none"> • Consider paying for yourself if offered any hospitality by a supplier or third party 	

XXX Academy

RECORD OF GIFTS and HOSPITALITY (accepted*/refused*)

*Delete as appropriate

This form must be completed by any member of staff or governor receiving or declining a gift or hospitality, which relates to their position in the School and has a value of more than £30. If the individual is concerned about the likely "level" of any gift or hospitality that he or she may receive, agreement from the Head teacher or Chair of Governors must be obtained in accordance with the school's guidance.

Name of staff/Trustee/ Governor	Position held
Name of individual, company or organisation offering gift or hospitality	
Date, time and venue	Gift/Hospitality Accepted*/Declined*
Nature and approximate value of hospitality/gift. If accepted, has the gift been retained for personal use or for School use?	
If accepted, reason for accepting hospitality/gift	
Signed: Approved By: (Head teacher/ Chair of Governors signature)	Date

PLEASE RETURN COMPLETED FORM TO THE ADMIN OFFICE FOR RETENTION ON THE GIFTS & HOSPITALITY REGISTER

